

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

Overview

At all relevant times, **TIANNA COSBY** a/k/a “Mendoza,” TOMMI COSBY, MARCHE SISCO (“SISCO”), BINIAH CARTER (“CARTER”), and ZION ADEDUWON (“ADEDUWON”) were residents of Maryland. SISCO was a mail handler assistant for the United States Postal Service (“USPS”) at the Washington Network Distribution Center (“NDC”) located in Capitol Heights, Maryland. The NDC was a USPS facility responsible for sorting and distributing mail from across the United States. As a mail handler assistant at the NDC, SISCO had access to mail matter, including personal and business checks.

Beginning in at least March of 2021 and continuing through at least in or about August of 2021, the Defendant, **TIANNA COSBY**, knowingly and willfully conspired, confederated, and agreed with TOMMI COSBY, SISCO, CARTER, and ADEDUWON, and others, to execute, and attempt to execute, a mail and bank fraud conspiracy. For the purposes of executing and attempting to execute the conspiracy and scheme to defraud, **TIANNA COSBY**, TOMMI COSBY, SISCO, CARTER, ADEDUWON, and others, stole checks from the United States mail stream bearing the means of identification of real people, altered and falsified those stolen checks, and deposited them to bank accounts at financial institutions to obtain money, in violation of 18 U.S.C. §§ 1341 and 1344.

In addition, **TIANNA COSBY** knowingly and willfully possessed, transferred, and used the means of identification of numerous real persons, without lawful authority, knowing that the means of identification belonged to a real person, during and in relation to the conspiracy and scheme to defraud, in violation of 18 U.S.C. § 1028A. The use of the means of identification was at the crux of **TIANNA COSBY**’s and her co-conspirator’s criminal conduct.

Conspiracy to Defraud

Beginning in March 2021, **TIANNA COSBY** organized and led a group of individuals, including TOMMI COSBY, SISCO, CARTER, and ADEDUWON in a wide-ranging conspiracy to defraud financial institutions by depositing checks that had been stolen from the mail and subsequently altered and falsified. **TIANNA COSBY** acquired checks for the conspiracy by either stealing checks from USPS collection boxes or receiving them from SISCO, who stole checks from the NDC. Once the checks were procured, **TIANNA COSBY**, TOMMI COSBY, SISCO, CARTER, and ADEDUWON did the following as part of the conspiracy and scheme to defraud:

- recruited and caused the recruitment of account mules.¹
- collected banking information and the means of identification belonging to account mules;
- transferred and exchanged the banking information and the means of identification belonging to account mules, including that belonging to Account Mule #1 and Account Mule #2;
- used, transferred, and possessed the means of identification belonging to identity theft victims, including Identity Theft Victims #1 through #5;
- altered personal and business checks to reflect payments to account mules;
- deposited altered and fraudulent checks into bank accounts belonging to account mules at financial institutions, as defined in 18 U.S.C. § 20; and
- obtained proceeds from altered and fraudulent checks by engaging in various monetary transactions to withdraw the proceeds, including by ATM cash withdrawals and peer-to-peer financial transfers.

The conspiracy stole, altered, and negotiated checks at a high rate, victimizing banks, ordinary people, businesses, and local governments. For instance, between June 22, 2021 and July 15, 2021 (a period less than one month), **TIANNA COSBY** and **SISCO** communicated regarding the sale, distribution, and purchase of approximately 695 stolen checks, with a face value of approximately \$5,127,156.41. These checks represent only a small fraction of those stolen by the conspirators.

In addition to altering and negotiating fraudulent checks, the conspirators also used encrypted online platforms, such as Telegram, to sell checks to fraudsters across the United States. The conspirators then mailed the checks they sold using the USPS. For example, on or about June 29, 2021, **SISCO** messaged **TIANNA COSBY** an image of Check No. 24432, which was written for \$26,915.67. Telegram messages recovered on **TIANNA COSBY**'s phone show that she sold Check No. 24432 to a user on Telegram. In the conversation, the user requested that the check be mailed to an address in Chicago, Illinois, and **TIANNA COSBY** responded that she would mail the check the same day. USPS records show that on June 30, 2021, an express mail parcel was sent from Clinton, Maryland to the Chicago address provided by the Telegram user. On July 9, 2021, Check No. 24432 for \$26,915.67, drawn from an account owned by Company #1 was deposited into a Bank of America account owned by an account mule, who was not the intended payee of

¹ An "account mule" was an individual whose bank account was used to deposit illegally acquired checks and proceeds.

the check. Because of the sheer quantity of stolen checks that were sold elsewhere, the resulting loss is incalculable.

Indeed, due to the vast quantity of checks that were stolen, sold, altered, and negotiated by the conspiracy, law enforcement focused on a sampling of approximately 93 checks² that were stolen between August of 2020 and August of 2021, totaling approximately \$690,889.75. Each of the 93 checks were altered and negotiated into account mule bank accounts by the conspirators. Of the 93 checks, the conspirators successfully obtained money from 73 of them, resulting in an actual loss of approximately \$278,739.50, a success rate of approximately 78%. Some of these fraudulent transactions are highlighted below.

Check 1903, Identity Theft Victim #1

Identity Theft Victim #1 is a real person and is a resident of North Carolina. On or about February 25, 2021, Identity Theft Victim #1 wrote a check from their PNC bank account (“Check 1903”) for approximately \$6,000 to Person #1, in Washington D.C., and mailed it by placing the check in a blue USPS collection box in North Carolina. Check 1903 was subsequently stolen by SISCO from the NDC and altered by **TIANNA COSBY** for the benefit of the conspiracy. **TIANNA COSBY** altered the check by changing the payee to reflect the name of an account mule and by increasing the amount to be paid to \$8,695.

On March 5, 2021, **TIANNA COSBY** was captured depositing the altered check at an ATM terminal located at PNC Bank in Clinton, Maryland.³ **TIANNA COSBY** unlawfully possessed, altered, and used Check 1903, a financial instrument containing Identity Theft Victim #1’s means of identification, to include their name, address, and bank account information, knowing that Identity Theft Victim #1 is a real person. **TIANNA COSBY** deposited the fraudulent check to an account mule’s bank account and used Identity Theft Victim #1’s means of identification to steal money from their bank account and defraud PNC Bank, while also concealing her own identity.

Check 2017, Identity Theft Victim #2

Identity Theft Victim #2 is a real person and is a resident of North Carolina. On or before April 2, 2021, Identity Theft #2 wrote a check from their State Employees’ Credit Union⁴ bank account (“Check 2017”) for approximately \$435.31 to Pentagon Federal Credit Union in Arlington, Virginia, and mailed it using the USPS. Check 2017 was subsequently stolen by SISCO

² To demonstrate the scope of the conspiracy, only approximately 10 of the approximately 695 checks that were stolen between June 22, 2021 and July 15, 2021 were used in this sampling.

³ PNC Bank is a financial institution as defined in 18 U.S.C. § 20.

⁴ State Employees’ Credit Union is a financial institution as defined in 18 U.S.C. § 20.

from the NDC and altered by the conspirators. The check was altered to reflect an account mule as the payee. The amount of the check was also altered to reflect a payment of \$950.

On or about May 14, 2021, **TIANNA COSBY** was captured depositing the altered check at an ATM terminal located at Navy Federal Credit Union in Clinton, Maryland.⁵ **TIANNA COSBY** unlawfully possessed, altered, and used Check 2017, a financial instrument containing Identity Theft Victim #2's means of identification, to include their name, address, and bank account information. **TIANNA COSBY** possessed, altered, and used Identity Theft Victim #2's means of identification to steal money from their bank account and defraud Navy Federal Credit Union.

Check 590, Identity Theft Victim #3

Identity Theft Victim #3 is a real person and is a resident of North Carolina. On or around May 13, 2021, Identity Theft #3 wrote a check from their Aquesta Bank account ("Check 590") for approximately \$750 to Bank of America as a mortgage payment and mailed it using the USPS. Check 590 was subsequently stolen by SISCO from the NDC and altered by the conspirators. The check was altered to reflect an account mule as the payee and to reflect a payment of \$800.

On May 21, 2021, surveillance captured CARTER and **TIANNA COSBY** entering an ATM terminal at Navy Federal Credit Union in Clinton, Maryland together. Surveillance captured CARTER and **TIANNA COSBY** walking to ATMs next to each other and using bank cards belonging to two different account mules. CARTER and **TIANNA COSBY** were captured accessing the respective account mule accounts and depositing several stolen and fraudulent checks. CARTER deposited a total of six, totaling approximately \$5,500. One of the check CARTER was captured depositing was Check 590 belonging to Identity Theft Victim #3. Carter possessed and used Identity Theft Victim #3's means of identification to steal money from their bank account and defraud Navy Federal Credit Union.

Check 73279, Account Mule #1

The Branch Banking and Trust Company ("BB&T") was a financial institution as defined in 18 U.S.C. § 20. On or before June 21, 2021, BB&T issued a check to Navy Federal Credit Union for approximately \$9,000 ("Check 73279") and mailed it using the USPS. Messages from **TIANNA COSBY**'s phone show that on or about June 24, 2021, SISCO messaged **TIANNA COSBY** a photograph of checks that she had stolen from the NDC, followed by the message, "Few new persys." In response, **TIANNA COSBY** reacted by electronically indicating that she "loved" the photograph and asked SISCO whether there were "Any bbt ? 10-20." SISCO responded by asking, "Any amount," and **TIANNA COSBY** messaged, "10k+" and "Bizzo." SISCO then said, "None it'll be 9k & under," and sent a photo of approximately seven checks she had stolen from the NDC, with the message "Highest Bizzos bbt." One of the seven checks was Check 73279 from BB&T to Navy Federal Credit Union.

⁵ Navy Federal Credit Union is a financial institution as defined in 18 U.S.C. § 20.

On June 25, 2021, messages from **TIANNA COSBY**'s phone show that ADEDUWON messaged **TIANNA COSBY** the name and mailing address of Account Mule #1, along with PIN number for Account Mule #1's BB&T business bank account. ADEDUWON informed **TIANNA COSBY** that the information pertained to Account Mule #1's "Bbt business account" that had "only been open 11 months tho so dont do nun too high." ADEDUWON then asked **TIANNA COSBY**, "U think u gon make it or na," to which **TIANNA COSBY** responded, "Nah wait" and "Unless u want me jus do 9." ADEDUWON responded, "Yeah" and "That's what i was thinking."

Bank surveillance from an ATM terminal at BB&T Bank in Upper Marlboro, Maryland captured **TIANNA COSBY** depositing Check 73279 into Account Mule #1's BB&T business account at approximately 7:47 p.m. on June 25, 2021. Check 73279 had been altered to reflect Account Mule #1 as the payee. Messages from **TIANNA COSBY**'s phone show that at approximately 7:48 p.m., on June 25, 2021, **TIANNA COSBY** sent ADEDUWON a photograph of a BB&T receipt showing that a \$9,000 check had been deposited into Account Mule #1's bank account. On the following day, June 26, 2021, **TIANNA COSBY** sent ADEDUWON a photograph of Account Mule #1's BB&T access card, showing the access card number.

Records obtained from Apple Cash show that on June 26, 2021, a transfer of \$1,500 was made to ADEDUWON's Apple Cash account from Account Mule #1's BB&T bank account. Records also show that on July 15, 2021, a transfer of \$3,000 was made from Account Mule #1's BB&T bank account to an account Apple Cash account held in the name of someone other than **TIANNA COSBY**, which she controlled. Indeed, records show that \$3,000 was subsequently transferred to an account held by **TIANNA COSBY**.

Account Mule #1 provided their means of identification to conspirators under false pretenses, believing that she was applying for COVID-19 benefits on behalf of her business. After deceitfully obtaining Account Mule #1's means of identification, **TIANNA COSBY** and ADEDUWON used it to falsify Check 73279 to reflect Account Mule #1 as the payee, and then used it to deceive BB&T into believing Account Mule #1 was the depositor and authorized to have the funds.

Check 3411, Identity Theft Victim #5 and Account Mule #2

Identity Theft Victim #5 is real person, a resident of Washington D.C, and is approximately 83 years old. On or before June 26, 2021, Identity Theft Victim #5 wrote a check from their Wells Fargo Bank⁶ account to Savannah Country Day School for approximately \$8,912.50 ("Check 3411") and mailed it using the USPS. Messages from **TIANNA COSBY**'s phone show that on or about June 26, 2021, **TIANNA COSBY** messaged SISCO asking whether she had "Any wells persy?" In response, SISCO sent **TIANNA COSBY** an image of 18 checks, with a face value of over \$400,000. One of those 18 checks was Check 3411 from Identity Theft Victim #5 to Savannah Country Day School.

⁶ Wells Fargo Bank is a financial institution as defined in 18 U.S.C. § 20.

A group chat from **TIANNA COSBY**'s cellphone between **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** shows that on or about June 29, 2021, **TIANNA COSBY** requested **CARTER** to "send navy name rq." **TOMMI COSBY** responded, "I think this it . . . [Account Mule #2]." **TOMMI COSBY** then messaged the group Account Mule #2's personal identifiable information, including address, and online banking credentials. **CARTER** responded to the group chat with Account Mule #2's personal identification number ("PIN").

That same day, on or about June 29, 2021, bank records show that an altered version of Check 3411 was deposited to Account Mule #2's Navy Federal Credit Union account at an ATM terminal in Clinton, Maryland. Check 3411 had been altered to reflect Account Mule #2 as the payee. Messages from **TIANNA COSBY**'s phone shows that between July 6th and July 7th 2021, **TIANNA COSBY** instructed **CARTER** to access Account Mule #2's online banking account and take a screenshot of the balance. **CARTER** did so and messaged a screenshot of Account Mule #2's balance to the group chat. **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** then conversed about how to split the fraud proceeds. On or about July 6, 2021, Apply Pay records show that Account Mule #2 purportedly made 20 peer-to-peer transfers to **CARTER**, totaling approximately \$3,881.00. On or about July 7, 2021, CashApp records show that Account Mule #2 purportedly made an additional four peer-to-peer transfers to **CARTER**, totaling \$1,045.00. Records show that the money was subsequently distributed between **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER**.

Account Mule #2 provided their information to conspirators under false pretenses, believing that they were providing their personal identifiable information to obtain a loan to pay rent. As a result of the fraudulent check being deposited into Account Mule #2's account, their account was locked and they were unable to pay rent, resulting in their eviction.

Accordingly, **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** stole the means of identification of Identity Theft Victim #5 and deceitfully obtained the means of identification of Account Mule #2. **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** thereafter used Identity Theft Victim #5's means of identification to steal money from their account and defraud Navy Federal Credit Union. **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** also used Account Mule #2's means of identification by falsifying Check 3411 to reflect Account Mule #2 as the payee and then used Account Mule #2's banking information and credentials to deceive BB&T into believing Account Mule #2 was the depositor and authorized to have the funds. **TIANNA COSBY**, **TOMMI COSBY**, and **CARTER** also used Account Mule #2's specific banking information to access Account Mule #2's bank account to engage in financial transactions.

Check 2204, Company #2

Company #2 was a business in North Carolina. On or before June 23, 2021, Company #2 wrote a check to Company #3 for approximately \$44,011.53 ("Check 2204") and mailed it using the USPS. Messages from **TIANNA COSBY**'s phone show that on or about June 23, 2021, **TIANNA COSBY** messaged **SISCO** asking, "how was work stinky." **SISCO** responded, "Got a new batch goin to open in a sec when I get in." On or about June 24, 2021, **SISCO** sent **TIANNA COSBY** images of approximately 75 stolen checks, totaling approximately \$737,098.61. One of those 75 checks was Check 2204 from Company #2 to Company #3.

Later that same day, bank records show that an altered version of Check 2204 was deposited to an account mule's account at an ATM terminal in Alexandria, Virginia. Check 2204 had been altered to reflect an account mule as the payee. ATM surveillance captured TOMMI COSBY depositing the fraudulent check. Following the deposit, ATM surveillance captured **TIANNA COSBY**, TOMMI COSBY, and CARTER using the account mule's bank card to engage in ATM withdrawals. For instance, on or about July 4, 2021, ATM surveillance captured TOMMI COSBY withdrawing approximately \$300 from the account mule's account at an ATM in Largo, Maryland, using the account mule's access card.

Money Laundering Conspiracy

In addition to ATM withdrawals, members of the conspiracy withdrew money from account mule bank accounts by engaging in peer-to-peer money transfers, using platforms such as ApplePay and CashApp. To conceal the nature, source, and destination of the fraud proceeds when engaging in peer-to-peer withdrawals, **TIANNA COSBY** caused fraud proceeds to be received by intermediate bank accounts controlled by co-conspirators, including CARTER and Co-conspirator 1, before having the money transferred to business accounts she controlled, including Bank of America account ending in ***7376, held in the name of "Santos Detailing," and Bank of America account ending in ***1899, held in the name of "Spectrum Dynamics." Both Santos Detailing and Spectrum Dynamics were shell companies that **TIANNA COSBY** had opened for the purpose of laundering fraud proceeds. In fact, on June 23, 2021, in an iMessage conversation between **TIANNA COSBY** and SISCO, **TIANNA COSBY** admitted that she used "Santos Detailing" to launder her money, stating "Das how I clean my money," after SISCO had asked her what the business "Santos Detailing" was for.

During the investigation, law enforcement identified and traced the proceeds from approximately 20 checks⁷ that had been stolen by the conspiracy from the U.S. mail, altered, and deposited to bank accounts belonging to account mules. The checks belonged to approximately 17 different victims, totaled approximately \$576,332.06, and were deposited between April of 2021 and February of 2023. Of the \$576,332.06 deposited, the conspiracy successfully obtained approximately \$208,434. And of the \$208,434 obtained, **TIANNA COSBY**, CARTER, and Co-Conspirator 1, laundered approximately \$115,349.

Specifically, Co-Conspirator 1 received approximately \$112,000 in fraud proceeds in the form of peer-to-peer transfers from account mule bank accounts and transferred approximately \$107,000 to Santos Detailing and Spectrum Dynamics, accounts controlled by **TIANNA COSBY**. **TIANNA COSBY** caused the money to be routed to Co-conspirator 1's bank account and then to Santos Detailing and Spectrum Dynamics to conceal the nature, source, and destination of the proceeds. Co-conspirator 1 reserved approximately \$5,000 as a fee for laundering the proceeds. CARTER received approximately \$8,100 in fraud proceeds in the form of peer-to-peer transactions. The funds were transferred to Bank of America business account ending in ***6744, held in the name of "Biniahs Adolosecents LLC," which CARTER had opened in June of 2021

⁷ These 20 checks do not overlap with any of those previously mentioned, including the sampling set of 93 and the 695 checks stolen between June 22, 2021 and July 15, 2021.

and used to launder fraud proceeds through. Of the \$8,100 received, CARTER transferred approximately \$5,926.00 to Santos Detailing and Spectrum Dynamics.

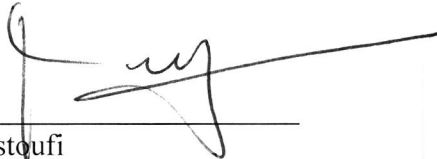
Search Warrant at the Woodbridge Residence

On January 19, 2024, law enforcement executed a search warrant at **TIANNA COSBY**'s residence in Woodbridge, Virginia ("Woodbridge residence"). Inside the residence, law enforcement recovered twenty-seven (27) designer handbags and fourteen (14) pieces of jewelry, including rings, necklaces, bracelets, brooches, and a wristwatch. The jewelry and the designer handbags had been purchased with proceeds from the instant scheme to defraud. The jewelry and designer handbags were subsequently professionally appraised and had a combined fair market value of approximately \$137,555.00, consisting of approximately \$113,065 in designer handbags and approximately \$24,490 in jewelry.


Inside the Defendant's BMW i8, law enforcement recovered a Louis Vuitton bag containing 151 checks that had been stolen from the mail. The total value of the checks was approximately \$610,788.08. The checks belonged to victims all across the United States. In addition to the BMW i8, which records show **TIANNA COSBY** purchased for \$114,296.02, **TIANNA COSBY** owns a BMW 330i, which has a retail value of \$51,154.40. Wage records show that **TIANNA COSBY** has not earned a wage since the third quarter of 2020.

In total, the conspiracy victimized over 900 persons—more than ten of whom sustained actual loss or had their means of identification possessed and/or used in furtherance of the fraud scheme.


SO STIPULATED:



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